IRISH GREEN BUILDING COUNCIL'S SUBMISSION – IRELAND'S DRAFT NATIONAL NATURE RESTORATION PLAN

ABOUT THE IRISH GREEN BUILDING COUNCIL

The Irish Green Building Council (IGBC) provides leadership for a sustainable built environment. The IGBC is a registered charity with over 480 corporate members drawn from all parts of the value chain, from occupiers, design professionals, contractors, suppliers, academics and public authorities, and is affiliated with a global network of 70 national councils within the World Green Building Council. This allows us to create workable solutions and tools to deliver transformative change towards a sustainable built environment. The IGBC is also the national partner of the Renovate Europe campaign in Ireland. Renovate Europe is the only EU-wide campaign focusing exclusively on ambitious renovation of the building stock in the EU and is the voice for energy-efficient renovations, taking a technology neutral, integrated, and holistic approach to energy efficient renovation.

The IGBC is looking to transform the Irish industry to sustainable practices through policy creation, education and the provision of tools to measure and accelerate progress.

Protecting and enhancing biodiversity in the built environment [1]is one of the IGBC's priorities. Since 2022, the organisation has been running **webinars and training for building professionals on this topic**, as well as a successful multi-disciplinary **community of practice** that meets quarterly to discuss common challenges and learn from each other. This work has been complemented by a number of research projects, including the **development of Irish case studies on the protection and enhancement of biodiversity in our built environment** – with funding from Construct Innovate and the Land Development Agency, as well as **a report on key actions required to ensure the protection and enhancement of biodiversity becomes the new norm in residential developments across Ireland.** The latter was developed in partnership with Trinity College Dublin and with the support of the Housing Agency, through extensive stakeholder engagement.

Further information on this work, including copies of the final reports, can be found at: Biodiversity and the Built Environment in Ireland.

[1] The built environment covers residential and non-residential buildings, as well as associated infrastructure, e.g., roads and railways.

Furthermore, **IGBC's Home Performance Index certification – which promotes holistic sustainability in new residential developments[2] - includes a number of indicators requiring the active enhancement and protection of biodiversity on site**. This includes a minimum ecology requirement, the intent of which is to enhance the site's ecological value and biodiversity and support the EU Biodiversity strategy. Another indicator is Surface Water Run Off which encourages the use of sustainable urban drainage system (SuDS) among other measures aimed at reducing the risk of pollution as well as flooding.

The content of this submission is based on the work completed as part of the projects and initiatives mentioned above, including engagement with over 100 building professionals as part of the BioNeighbour project, 50 members of the "Biodiversity & the Built Environment" community of practice and 100 county councils staff members during a workshop IGBC hosted in April 2026.

Our submission **focuses on articles that relate directly or indirectly to the protection and enhancement of biodiversity in the built environment**, i.e., article 8 - 'Restoration of urban ecosystems', but also targets on tree planting and articles 9, 10, and 13.

The first section (**Summary**) outlines overarching feedback on the draft plan and highlights the key actions needed to safeguard biodiversity within the built environment, thereby strengthening delivery of the national plan. The second section (**Specific Comments**) provides detailed observations on the individual actions proposed in the draft plan.

SUMMARY

- The **IGBC welcomes this consultation on Ireland's draft National Nature Restoration Plan**.

- **Investors, policymakers, and emerging regulatory requirements**, including the NRL, the Energy Performance of Buildings Directive (EPBD), the EU Taxonomy for Sustainable Finance, and the upcoming EU Climate Resilience Framework**, are all driving a shift towards better protection and enhancement of biodiversity in the built environment**, including the use of green blue infrastructure (GBI).

- However, despite this growing momentum, **implementation on the ground remains inconsistent and fragmented**, **posing risks to the timely consenting and**

[2] 33,368 units and 138 projects are currently registered. 5,514 units and 38 projects have already been certified. Read more about certified projects here.

delivery of housing and infrastructure, and the protection of nature – not to mention the myriads of co-benefits associated to it (1).

- While it is extremely **challenging to provide a comment on the current draft plan with no details provided on the implementation of Article 8 (urban ecosystems) nor how actions outlined would be funded,** we strongly encourage the Department to **seize this opportunity to provide clarity and certainty to the industry, and invest in the infrastructure we need to protect and enhance biodiversity in our built environment**, while delivering the homes and infrastructure required. With approximately 50,000 new homes required every year through 2040—along with the infrastructure to support them—the need for decisive action is immediate.

More specifically, we recommend the immediate prioritisation and investment in the following actions:

1. **Development and implementation of a coordinated national framework on biodiversity and planning in the built environment –** *Through the development of a specific National Planning Statement (NPS)*

The framework should be grounded in **the mitigation hierarchy**—avoid, minimise, restore, enhance—and supported by **evidence based local ecological mapping**[3] to be embedded at national (National Planning Framework) and regional (Regional Spatial and Economic Strategies) levels, and in each local authority's County Development Plans. This approach would ensure consistency in decision-making, reduce legal uncertainty, and enable early identification of ecological constraints and opportunities during site selection and master planning, while also addressing biodiversity impacts beyond the site boundary, such as recreational pressures.

2. **Adopt a common, national standardised measurement tool**

[3] This should cover designated sites such as SACs, SPAs, pNHAs, NHAs, and Annex I habitats of the Habitats Directive (including those outside designated areas), as well as key linear habitats such as hedgerows, treelines, and waterways. It should also identify Biodiversity Opportunity Areas where the offsetting of development-related biodiversity impacts could be delivered beyond individual development sites.
This approach is strongly supported at EU level to deliver on the objective of the EU Nature Restoration Law. See Ramboll's European Biodiversity Metric, and the findings of a session on "Measuring and addressing biodiversity in construction" organised in June 2026 by the network of European Green Building Council (unpublished).

Building upon existing Irish and international tools, adopt a standardised, practical, national approach to biodiversity metrics to provide clarity and consistency of expectations for development projects in integrating measures for nature.

This metric should:

- reflect the ecological baseline and mature ecological features on a site,
- differentiate between infill, brownfield, and greenfield contexts,
- be used as a secondary safeguard after early baseline assessment and application of the mitigation hierarchy – see point 1.

3. Provide standardised toolkits, guidance documents, and templates to inform master planning and site layouts

Clear, accessible guidance is essential to support consistent implementation. This should include guidance on the use of the metric, best practice design and maintenance principles for integrating nature into developments, promoting ecological connectivity, and ensuring that site layouts respond to the surrounding landscape in new development. A limited number of standardised templates, such as the Biodiversity Checklist for Planning, currently being developed by the NPWS[4], would help streamline planning submissions and reduce administrative burden for both applicants and planning authorities.

4. Knowledge transfer and skills training

Building upon existing initiatives such as Green Skills 2030,

- Prioritise the upskilling of built environment professionals and construction workers on biodiversity protection and enhancement in new developments through short and flexible training courses.

This may be best achieved through the development of courses tailored to relevant practitioner disciplines or project stages, emphasising applied solutions and project examples from experienced practitioners. Where possible, these courses should be delivered through existing channels such as the Local Authority Services National Training Group, the OPR training pathways, the CIF, RIAI training, or Skillnet. Integration with existing training may be suitable in some cases, for instance, with Construction Environmental Management Plans (CEMP) for staff and site supervisors.

- To further incentivise upskilling, ensure the quality of design and delivery on all projects, as well as the protection of biodiversity at all stages of the construction

[4] Such a checklist is already in use in Northen Ireland. See: NI Biodiversity Checklist documents | Department of Agriculture, Environment and Rural Affairs.

process, develop and mandate a "Sustainability Pass" using the Safe Pass model. In addition to a general introduction to sustainability, renewables, energy and resource efficiency, this should incorporate a baseline level of fundamental knowledge on biodiversity and development for all built environment and construction workers and professionals. This could build upon existing courses, such as the Nature Skills Training for public sector staff and contractors piloted by Laois Offaly ETB.

- Promote opportunities offered by careers around protecting and enhancing biodiversity in the built environment, including ecology and botany – two disciplines in which labour and skill shortages have been identified.
- Existing apprenticeships and construction-related third level courses should be reviewed to ensure biodiversity in the built environment is fully covered.

5. Local Authorities: Resourcing and Knowledge Transfer

While many local authorities are demonstrating leadership in protecting and enhancing biodiversity within the built environment, the overall approach remains fragmented and inconsistent. To promote best practice, clarify expectations, and build stronger ecological expertise across the construction and planning sectors, we encourage the Department to invest in the following actions:

- ***Upskilling local authority staff*** — Actively support training and knowledge transfer among local authority teams to ensure consistent, high-quality ecological input across all stages of development.
- ***Strengthening ecological capacity*** — In addition to biodiversity officers (who currently have no role in planning), ensure each local authority can employ at least one planning ecologist (this approach is already taken by a few local authorities, e.g., Cork County Council) and guarantee that suitably qualified professionals are involved throughout the development process. Planning ecologists should engage with both public and private developers at key stages, including pre-application and compliance sign-off. Furthermore, GIS specialists should be employed at local or regional level to maintain Green and Blue Infrastructure (GBI) mapping and provide robust spatial data to inform proper planning.

6. Supporting overall restoration targets (article 4)

In parallel, to reach our overarching restoration targets, and to ensure that the protection and enhancement of biodiversity—and its conservation status—do not become a constraint on the development of much needed homes, the Government must invest in building biodiversity capacity. This includes actions such as habitat

restoration and reversing unfavourable conservation trends, as required under Article 17 of the Habitats Directive. Strengthening this biodiversity capacity will improve the ability of ecosystems to "absorb" and respond to the impacts of development, both during construction and operation, including recreational pressures beyond the development site boundary. It will also support more efficient consenting processes and help navigate legislative requirements such as EIA, AA, and the WFD.

All these actions support alignment with EU policy frameworks, and in addition to supporting the Government in delivering Ireland's National Nature Restoration Plan, will help Ireland meet requirements set under the Energy Performance of Building Directive, the EU Climate Resilience Framework, the EU Taxonomy, the Water Framework Directive as well as other policies outlined in the Bio - Neighbour report.

IGBC is ready to support Government through implementation by providing technical expertise, stakeholder engagement, and practical guidance to ensure effective and coherent delivery.

SPECIFIC COMMENTS

Article 4: Restoration targets and obligations (and article 8)

- The consultation draft states in Article 4.2.7 that "*LIFE, Horizon Europe, INTERREG, and Shared Island funding are the principal sources of financing for urban restoration projects.*" The IGBC finds this concerning, as the implementation of the Nature Restoration Regulation, including Articles 4 and 8, requires proper resourcing and cannot rely on EU project funding alone.
  Government must invest in the protection and enhancement of biodiversity in urban ecosystems[5]. As recommended in our report under Action 6 - Government must "*provide additional resources in the form of capital funding for urban greening projects and Nature-based Solutions as part of public infrastructure schemes, to maintain and expand the extent and quality of Green and Blue Infrastructures"* **This need not be highly costly to the State, as many solutions already exist; they simply need to be adopted and applied consistent.**

  For example, **developing a simple, proportionate measurement tool for sites zoned for development**, as suggested in the previous section, is estimated by IGBC

[5] In addition to the protection of biodiversity, and supporting the timely delivery of required homes and infrastructure, it would provide a myriad of co-benefits, in particular in relation to climate adaptation (e.g., flooding and overheating risks), and health and wellbeing. E.g., Increasing tree cover in cities to 30% can reduce the temperature of urban environments by up to 1.3°C, and prevent 1/3 of premature deaths attributable to urban heat islands in summer (Barcelona Institute of Global Health - 2022) | Vegetation cover and afternoon bird abundances are positively associated with a lower prevalence of depression, anxiety, and stress (Daniel T. C. Cox et al. - 2017)

to require **an investment of just €1,500,000** (based on costings for external consultants). This relatively modest figure reflects the fact that the work would not start from scratch: existing, tested Irish solutions (e.g. Transport Ireland Infrastructure metric) could be adapted rather than built anew.

Similarly, **developing any missing practical, standardised toolkits, guidance documents, and templates** to inform master planning and site layouts is **estimated at €1,250,000** (based on producing up to 5 guidance documents, benchmarked against similar tenders issued by DHLGH). Again, the cost is kept low because much of the groundwork already exists - *A cost analysis of the actions recommended in the previous paragraph is included in appendix 1*.

• The draft also states that *"market development is also expected to be uneven, with stronger prospects in agricultural ecosystems, peatlands, and freshwater catchments, and more limited private-finance potential in urban and complex multi-benefit restoration contexts. (Article 4.3.1.4)"* The IGBC wishes to reiterate that **urban ecosystems should also be given a prominent place and dedicated resources in the final version of the plan.**

Particularly in relation to large-scale Nature-based Solutions, **mechanisms for public/private collaboration should be introduced**. Furthermore, if a metric is to be developed, it is important to simultaneously **create a market for biodiversity credits**. The public sector must invest, but this investment should also occur in collaboration with private entities, an approach that could provide both the space and the framework needed in the final Nature Restoration regulation. With that regard, we strongly encourage the Department to get involved in and strongly support the development and implementation of the EU Nature Credits Roadmap to reward nature-positive action and boost private finance.

Article 10: Pollinator diversity and populations

• IGBC welcome the actions proposed under Article 10 "*Pollinator diversity and populations",* which we consider supportive of our call for biodiversity mapping and of urban ecosystems (as described in the previous paragraph), especially in relation to the following points at Article 10.1.1.1:

2. Local authorities & public bodies – making public land pollinator friendly ;

3. Transport Authorities and Utilities – creating pollinator corridors across the landscape;

4. Buzzing Communities

That said, most of these actions already appear to be underway through the National Biodiversity Data Centre's All-Ireland Pollinator Plan. We would also stress that, particularly with respect to **community-led action**, delivery **should not be left solely to voluntary initiative.** It should instead be p**roperly coordinated and funded by central government and/or local authorities**, and consistently embedded within a broader plan for nature and urban ecosystems.

Article 9: Restoration of the natural connectivity of rivers and natural functions of the related floodplains

The IGBC would like to take this opportunity to remind the Department of the strong connection between actions taken at the river-catchment level and their impacts on the built environment. While the scope for nature-based solutions (NbS) within housing projects may be limited in some areas due to space constraints and associated economic considerations, catchment-scale NbS measures should be strongly encouraged. These interventions are often cost-effective, deliver carbon and wider environmental benefits, and play a critical role in climate adaptation—particularly in reducing flood risk within the built environment.

However, as highlighted in previous sections, the effectiveness of these measures depends on access to high-quality ecological mapping to properly inform development decisions – *See section 1 in summary*.

Article 13: Planting three billion additional trees

- Section 13.1.2 — *"Approach to ensure that the planting of additional trees (i) is achieved in full respect of ecological principles, (ii) aims to increase ecological connectivity, and (iii) is based on sustainable afforestation, reforestation and tree planting and the increase in urban green space"* appears to be currently empty.
- When planting trees in urban areas and new residential developments, the mitigation hierarchy must be applied, as a young tree cannot replace or offset the biodiversity loss caused by removing an ancient woodland or hedgerow.
- More specifically, the guidance mentioned in point 3 under summary should set out best practice design principles for designing with nature and should promote early-stage involvement of ecologists on projects, explicitly prohibiting any site clearance within the five years preceding the submission of an application. The guidance should also promote ecological connectivity and consideration of the surrounding landscape in relation to the proposed site layout.

- Careful consideration should be given to planting **the right tree in the right place** in urban environments. While we strongly encourage the use of native species, urban areas facing a changing climate may also require climate-resilient species

capable of adapting to future conditions. Research in this field should be supported within an Irish context to ensure informed, locally appropriate choices.

- It is also important to note that developers currently face significant challenges in sourcing native trees and plants, as domestic nursery capacity is insufficient to meet demand. Increasing this capacity is essential to ensure a reliable supply of native species and reduce dependence on imports, which carry a higher risk of introducing plant diseases and are less sustainable overall. This could be supported through **Green Public Procurement**, with the State committing to plant a defined number of native trees over the next 15 years, providing nurseries with the certainty needed to invest and expand.
- Similarly, the planting of species known to be invasive—such as *Buddleja davidii* or *Prunus laurocerasus*—or species with clear invasive potential, even if not yet listed officially, should be strongly discouraged.
- Finally, and as highlighted in previous sections, Ireland can only reach article 13 targets with strong support for upskilling across the supply chain, and for awareness raising among the public and elected representatives. Likewise, opportunities offered by careers around protecting and enhancing biodiversity in the built environment, including ecology and botany, should be promoted.

Appendix 1: Indicative costing of key recommended actions

Actions	**Cost type** *(and indicative cost – where available)*
1. Develop and implement a coordinated national framework on biodiversity and planning of the built environment	
1.a Cross-departmental task force to lead on the development of the framework and its review	Direct exchequer (staff + overheads)
1.b Collection and development of evidence-based ecological mapping at local level	Direct exchequer (staff + overheads)
2. Adopt a simple, proportionate measurement tool for sites zoned for development	
2.a Overview of the development of the tool, including tender and consultation process, by the taskforce (1.a)	Direct exchequer (staff + overheads)
2.b Development of the tool set	Direct exchequer: *€1,500,000 (estimated based on using external consultants)*
3. Provide practical, standardised toolkits, guidance documents, and templates to inform master planning and site layouts	
3a. Taskforce (1a) to set up a multi-sector working group to review industry needs and	Direct exchequer (staff + overheads)

existing guidance, identify gaps, and develop a list of additional guidance documents needed, as well as a process to approve them 3b. Development of any missing guidance documents	Direct exchequer: *€1,250,000 (estimated based on the development of up to 5 guidance documents and on similar tenders issued by DHLGH)*